

Docket 71



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

June 23, 1992

Docket Nos. 50-387  
and 50-388

Mr. Harold W. Keiser  
Senior Vice President-Nuclear  
Pennsylvania Power and Light  
Company  
2 North Ninth Street  
Allentown, Pennsylvania 18101

Dear Mr. Keiser:

SUBJECT: SAFETY EVALUATION OF THE INSERVICE TESTING (IST) PROGRAM RELIEF  
REQUEST, SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2  
(TAC NOS. M82617 AND M82618)

By letter dated December 31, 1991, Pennsylvania Power & Light Company (PP&L) submitted Revision 7 (Unit 1) and Revision 4 (Unit 2) of the Susquehanna Steam Electric Station Inservice Testing Program. Revisions 7 and 4 incorporated NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," in order to comply with the PP&L response to GL 89-04 dated October 3, 1989, and the implementation status provided in their February 7, 1991, letter. NRC's letter of August 12, 1991, indicated that PP&L's response to GL 89-04 was considered complete, but that approval of the inservice testing program was neither intended nor implied. Therefore, the review performed for Revisions 7 and 4 included a determination of the status of each relief request.

The enclosed Safety Evaluation (SE) was prepared by the NRC to provide the results of the staff review. Pursuant to 10 CFR 50.55a(g), certain Class 1, 2, and 3 pumps and valves in water-cooled nuclear power facilities are required to meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code (Code), Section XI: specifically Subsection IWP, "Inservice Testing of Pumps in Nuclear Power Plants," and Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants." Guidance on acceptable alternatives to Code requirements has been provided for certain aspects of inservice testing by NRC in GL 89-04. Licensees were requested to review their IST programs against the guidance provided and make revisions as necessary to address the NRC positions in GL 89-04. PP&L responded for Susquehanna on October 3, 1989.

Table 1 of the SE provides the status of each relief request. Section 3.0 of the SE identifies concerns identified by the staff which require action by the licensee. PP&L should address these concerns by the schedule requested in the specific item, or within one year from the date of this SE if no schedule is stated, and respond with information on the resolution for each within one year of the date of this SE. For relief requests that have been denied, the licensee's testing should comply with the Code requirements or GL 89-04 within 90 days of the date of the SE.

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The licensee is required to comply with the IST Program defined in Revisions 7 and 4 where relief has been granted by GL 89-04 and the enclosed SE. IST Program changes such as additional relief requests or changes to approved relief requests should be submitted for staff review, but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in GL 89-04 should be submitted to the NRC staff, but can be implemented provided the guidance in GL 89-04, Section D, is followed. IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC.

The review performed did not include verification that all pumps and valves within the scope of 10 CFR 50.55a and Section XI are contained in the IST program. Additionally, for the components included in the IST program, no determination was made to ensure all applicable testing requirements were identified. Therefore, the licensee is requested to provide the NRC with a description of the process used in developing the IST program. The submittal should include, as a minimum, details of the documents used, the method of determining if a component requires inservice testing, the basis for the testing required, the basis for categorizing valves, and the method or process used for maintaining the program current with design modifications or other activities performed under 10 CFR 50.59. If a description of this process is not already available from existing documentation, the staff envisions that this request could be answered in 2 to 4 pages. It should be incorporated into the IST Program in appropriate sections. The information should be included with the licensee's response to the action items, or within one year of the date of this SE.

This action completes the work to be performed by the staff under TAC Numbers M82617 and M82618. If there are any questions regarding this letter, please contact me on (301) 504-1447

Sincerely,  
/s/

Charles L. Miller, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
Safety Evaluation

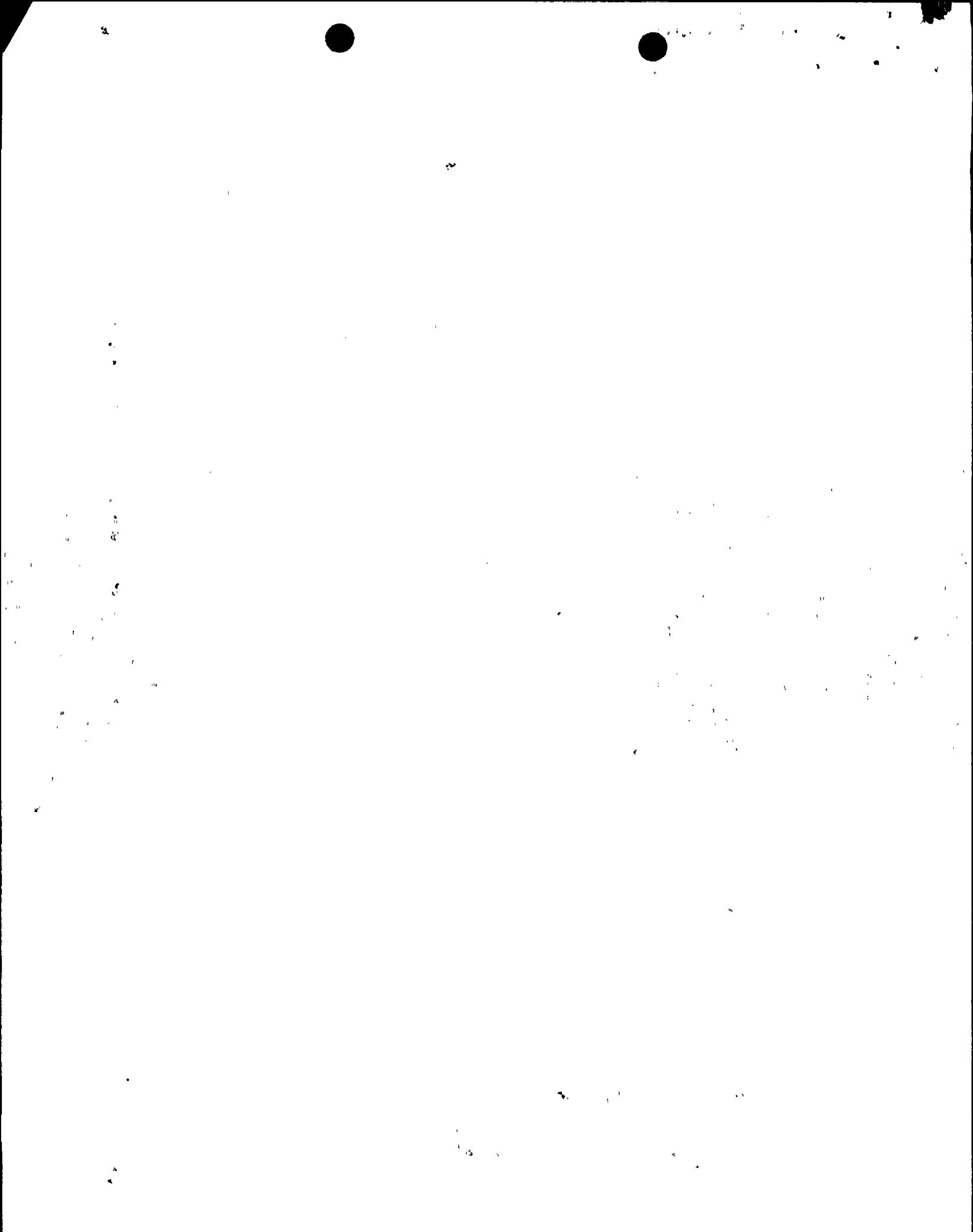
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Docket File	SVarga	ACRS(10)
NRC and Local PDRs	JCalvo	OPA
PDI-2 Reading	CMiller	OC/LFMB
TMurley, 12G-18	JRaleigh	RLobel, 17G-21
FMiraglia, 12G-18	MO'Brien(2)	EWenzinger, RGN-I
JPartlow, 12G-18	OGC	JWhite, RGN-I
CRossi, 11E-4	EJordan, 3701	PLCampbell/CYates, 7E-23
JLieberman, 7H-5	GHill(8)	JNorberg, 7E-23

\*Previously Concurred

OFFICE	PDI-2/LA	PDI-2/PB	PDI-2/D	OGC*	
NAME	MO'Brien	JRaleigh:rb	CMiller	JHu11	
DATE	6/17/92	6/17/92	6/23/92	06/17/92	



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*Charles L. Miller*

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Safety Evaluation

cc w/enclosure:  
See next page

Mr. Harold W. Keiser  
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Units 1 & 2

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